



ENSR International

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August 12, 2005

VIA FACSIMILE AND U.S. MAIL

Mr. Dennis D. Matlock, OSC
United States Environmental Protection Agency
Region III
Wheeling Office – Methodist Bldg.
1060 Chapline St. Suite 404
Wheeling, WV 26003-2995

**RE: 8th and Plutus Streets Pottery Site, Chester, WV
Administrative Order by Consent Docket No. CERC-03-200400255DC
Monthly Progress Report for July 2005**

Dear Mr. Matlock:

I am writing on behalf of Newell Holdings Delaware, Inc. ("Newell") pursuant to Paragraph 8.7 of the above referenced Order. I am pleased to enclose the Monthly Progress Report for July 2005. A certification for this Report from Newell is attached.

This Report references our telephone conversation of July 29, 2005 regarding the additional characterization activities planned to be undertaken along the western boundary of the site. Please contact me immediately if your understanding of our conversation differs from that described in the report, or if you have any other questions regarding the enclosed materials.

Very truly yours,
ENSR Corporation

Donald O. Nusser, PE
Project Manager

Reviewed by:

Kenneth Battyani
ECS Task Manager

cc: L. Meschede
H. Green
G. Rodriguez
A. Sawula
R. Hasson
W. Huggins



Newell Rubbermaid

August 12, 2005

Mr. Dennis D. Matlock, OSC
United States Environmental Protection Agency
Region III.
Wheeling Office – Methodist Bldg.
1060 Chapline St. Suite 404
Wheeling, WV 26003-2995

RE: 8th and Plutus Streets Pottery Site, Chester, WV
Administrative Order by Consent Docket No. CERC-03-200400255DC
Certification of Monthly Progress Report for July 2005

Dear Mr. Matlock:

ENSR Corporation is transmitting the above referenced Monthly Progress Report to you today on behalf of Newell Holdings Delaware, Inc. ("Newell") pursuant to Paragraph 8.7 of the above referenced Order. Pursuant to Paragraphs 22.1 and 22.2, I am writing to provide my certification of that report, as if the certification was printed on the report itself.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the Work at the 8th and Plutus Superfund Site, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: Louis Meschede, Jr.

Name (print): Louis Meschede
Title: Director, Environmental Affairs, Newell Rubbermaid, Inc.

Please contact me if you have any questions.

Very truly yours,

cc: D. Nusser
H. Green
G. Rodriguez
A. Sawula
R. Hasson
W. Huggins

MONTHLY PROGRESS REPORT
8th Street and Plutus Avenue Pottery Site
Chester, West Virginia
July 2005

Background and Objective

On September 30, 2004, an Administrative Order by Consent for Removal Response Action (Consent Order) was entered into between Newell Holdings Delaware, Inc. (Newell) and the United States Environmental Protection Agency (EPA) (Docket No. CERC-03-2004-0255DC). Pursuant to the Consent Order, Newell must submit monthly progress reports to EPA. This Progress Report is organized in the following manner:

- Activities Undertaken in July 2005
- Activities Planned for August 2005
- Problems Encountered
- Sampling Results
- Modifications

Summary of Activities Undertaken During July 2005

Actions undertaken on the project and at the Site during July 2005 include the following:

- Continued compilation of field data into tables and figures and continued data validation of the laboratory analytical data
- Analyzed samples of the investigation derived waste for characterization purposes
- Compiled the results of the drum survey conducted at the site in July
- Completed demobilization activities
- Continued preparation of the Remedial Action Implementation Plan

During compilation and plotting of validated data in late July, it was confirmed that certain areas along the western boundary of the Site have not been delineated to the 400 ppm lead guideline value contained in the Consent Order and RAP. Newell's representative Don Nusser (ENSR Corporation Project Manager) discussed the necessity of and proposed approach for additional soil characterization along the western boundary of the Site (on Hancock County School District property) with Dennis

Matlock, US EPA OSC, on July 29, 2005.

Mr. Matlock agreed in principle with the proposed approach for supplemental characterization (soil samples collected at the surface and at a depth of 2-3 feet) and also agreed that it is preferable to complete the site characterization, including the area in the extended sampling grid, prior to submitting the Remedial Action Implementation Plan (RAIP) to the agency, rather than submitting the RAIP while conducting the additional site characterization.

Summary of Activities Planned for August 2005

During August 2005, the following actions are planned to be undertaken pursuant to the approved RAP:

- Further investigate the source of drums encountered during the survey to determine which, if any, were associated with the former pottery manufacturing facility
- Complete independent data validation of the laboratory analytical data
- Complete the demobilization activities
- Continue preparation of the RAIP
- Prepare an amendment to the RAP ECS containing the scope of work and schedule for the supplemental characterization along the western boundary of the property as well as the revised Anticipated Response Action Schedule
- Pursue access agreements for property along the western boundary of the Site
- Potentially commence field work on the supplemental characterization (dependent upon timing of access agreement and US EPA approval)

Problems Encountered

No problems were encountered during the reporting period.

Sampling Results

Tables A and B containing the validated laboratory analytical data for Metals and PCBs, respectively, are attached.

Modifications

No material modifications were made to the response action or the RAP during the reporting period.

Attachments

Table A – Summary of Laboratory Analytical Data – Metals
Table B – Summary of Laboratory Analytical Data - PCBs

Table A
Summary of Laboratory Analytical Data
Metals
8th and Plutus Streets Site

Chemical Name Screening Level Unit Sample ID	ANTIMONY 4100 mg/kg	ARSENIC 19 mg/kg	BARIUM 720000 mg/kg	CADMIUM 10000 mg/kg	CHROMIUM (TOTAL) 31000 (1) mg/kg	COBALT 200000 mg/kg	COPPER 410000 mg/kg	LEAD 400 mg/kg	NICKEL 200000 mg/kg	ZINC 3100000 mg/kg
D-02-A	R	9.8	135	0.78 K	40.8 K	23.8	61.7 K	92.7	43.1	241
D-02-A2	R	9.6	127	0.78 K	37.2 K	24.6	59.8 K	79.2	42.6	235
D-07-A	0.34 B	8.8	79.3	0.50 U	12.2 K	4.1	94.9 K	68.9	9.3	47.7
D-08-B	0.33 L	17.6	137	0.81 K	27.8 J	17.4	128	181 L	27.9 J	137 K
D-11-B	R	17.3	162	1.1 K	46.4 J	19.5	205	77.3 L	43.8 J	168 K
D-11-B2	0.39 L	22.8 *	166	1.2 K	133 J	25.5	259	112 L	83.9 J	166 K
D-13-A	R	15.1	133	0.93 K	60.7 J	16.0	53.0	655 L *	39.7 J	136 K
D-14-A	R	9.6	161	0.79 K	67.9 J	18.4	46.2	645 L *	44.4 J	120 K
D-14-B	R	11.1	144	0.80 K	42.2 J	17.2	81.8	584 L *	29.5 J	122 K
D-14-C	R	8.9	191	0.53 K	49.5 J	15.7	174	26.2 L	35.6 J	94.0 K
D-15-A	1.0 UL	14.5	131	0.61 K	25.4	12.7	48.2 J	724 *	26.3	154 J
D-16-A	1.0 UL	12.2	147	0.43 K	27.6	12.7	170 J	404 *	22.7	127 J
D-17-A	1.0 UL	11.1	93.3	0.38 K	21.3	10.4	175 J	158	18.1	107 J
D-2-B	0.54 B	8.8	113	0.71 K	48.6 K	18.6	164 K	130	33.7	213
E-03-B	0.83 L	17.6	168	3.0 L	77.0 K	18.2	208 J	399 J	50.0	673 K
E-05-A	2.0 UL	21.1 *	164	2.6	79.1	19.6	292	372	46.1 L	380 J
E-08-B	1.0 UL	15.4	124	0.20	18.7	16.4	117	52.1	27.1 L	134 J
E-09-A	0.32 B	9.5	83.4	0.50 U	26.1	8.8	157 J	239	15.2	57.7
E-09-B	1.0 UL	30.3 *	141	0.82	30.9	16.3	174 J	185	34.5	177
E-09-C	0.37 B	18.8	298	0.28 K	24.8	17.1	163 J	372	27.5	220 J
E-12-C	1.0 UL	7.3	75.8	0.50 U	18.9	14.7	33.6 J	24.2	20.9	67.1 J
E-12-C2	1.0 UL	6.9	67.7	0.50 U	19.5	12.4	79.5 J	16.4	20.1	66.4 J
E-7-B	1.0 UL	20.0 *	168	0.38 L	34.6 K	16.0	320 J	162 J	33.3	194 K
E-7-B2	0.37 L	18.6	162	0.43 L	27.4 K	14.2	161 J	154 J	28.9	178 K
F-03-A	1.0 UL	11.8	157	1.2 L	37.0 K	31.9	56.2 J	353 J	57.1	371 K
F-08-D	1.0 UL	15.1	136	0.17 L	32.5 K	14.7	283 J	243 J	31.0	185 K
F-12-A	1.0 UL	11.7	191	0.18 L	47.3 K	17.9	108 J	427 J *	38.2	155 K
F-13-D	R	10.1	146	0.79 K	25.5 K	15.5	42.1 K	2020 *	26.6	147
G-03-C	0.65 L	18.5	155	2.0 L	68.0 K	26.6	321 J	348 J	54.4	463 K
G-04-A	1.0 UL	13.2	182	1.1 L	34.5 K	37.6	113 J	210 J	62.7	346 K
G-13-A	R	8.6	102	0.25 K	27.0 K	13.6	103 K	413 *	24.6	111
G-15-D	1.0 UL	9.4	241	0.12 K	26.8	15.1	76.3 J	153	30.2	105 J
G-16-B	0.35 L	12.3	158	0.96 K	42.4 J	16.2	167	161 L	29.1 J	160 K
H-14-B	1.0 UL	8.7	284	0.18 L	71.1 K	15.3	185 J	711 J *	49.1	252 K
H-16-A	1.0 UL	11.6	107	0.19	127	22.4	215	297	74.2 L	153 J
I-11-A	1.0 UL	8.3	116	0.30	24.4	10.5	110	339	17.9 L	203 J
I-15-A	R	4.7	47.7	0.49 K	15.8 K	23.0	32.4 K	381	101	66.6
I-17-A	0.48 L	13.7	143	1.2 K	45.0 J	13.9	378	290 L	65.7 J	298 K
I-17-B	R	10.7	158	1.1 K	30.6 J	13.4	58.3	565 L *	24.2 J	319 K
I-17-B2	0.48 L	11.2	159	1.0 K	77.9 J	16.9	43.6	460 L *	46.2 J	232 K
J-13-A	0.57 L	31.1 *	645	1.6	69.8	17.4	460	2270 *	64.7 L	288 J
J-13-C	1.0 UL	7.8	161	0.50 UL	27.6 K	17.1	84.1 J	183 J	29.4	149 K
J-14-B	R	6.6	94.2	0.16 K	18.8 K	10.9	218 K	355	15.9 K	113
J-14-C	R	6.3	105	0.13 K	20.3 K	11.4	175 K	147	18.0	80.8
J-17-A	R	8.9	70.2	0.48 K	24.5 K	11.0	49.1 K	2530 *	17.8	160
K-11-A	1.0 UL	7.4	67.6	0.17 K	12.8	8.8	59.1 J	68.8	14.2	73.0
K-11-B	1.0 UL	8.4	69.2	0.15 K	21.1	11.2	166 J	144	20.8	82.3 J
K-12-C	0.32 L	8.5	105	0.58 L	54.3 K	24.2	331 J	571 J *	33.6	374 K
K-15-A	R	10.8	89.1	0.60 K	20.3 J	11.5	49.7	487 L *	18.9 J	146 K
L-13-A	1.0 UL	6.7	133	0.50 UL	17.8 K	9.5	125 J	103 J	16.8	75.7 K
L-14-A	R	13.0	194	0.59 K	43.0 J	26.6	157	83.9 L	34.3 J	112 K
L-14-B	1.0 UL	12.5	114	0.50 UL	78.8 K	26.4	160	141 J	48.1	120 K
L-14-B2	1.0 UL	11.4	143	0.50 UL	47.8 K	27.9	126	144 J	40.0	135 K
L-15-A	0.94 L	41.6 *	99.9	0.92 L	120 K	295	284 J	574 J *	1900	304 K
L-15-B	0.92 L	7.5	247	2.2 L	22.3 K	10	886 J	203 J	23.7	373 K
L-16-A	2.0 UL	22.4 *	180	0.16 L	57.4	20.9	71.0 J	372 J	46.8	124
L-16-A MS/MSD	1.0 UL	9.0	75.0	0.50 UL	14.3 K	10.6	20.2 J	35.5 J	19.4	65.3 K
L-17-A	1.0 UL	11.2	120	1.1 K	52.4	10.1	136 J	877 *	21.3	283 J
M-13-B	1.0 UL	7.7	84.5	0.50 U	13.1	9.3	74.7 J	60.8	13.6	64.8

Table A
Summary of Laboratory Analytical Data
Metals
8th and Plutus Streets Site

Chemical Name Screening Level Unit Sample ID	ANTIMONY 4100 mg/kg	ARSENIC 19 mg/kg	BARIUM 720000 mg/kg	CADMIUM 10000 mg/kg	CHROMIUM (TOTAL) 31000 (1) mg/kg	COBALT 200000 mg/kg	COPPER 410000 mg/kg	LEAD 400 mg/kg	NICKEL 200000 mg/kg	ZINC 3100000 mg/kg
M-13-C	0.51 B	42.1 *	66.5	0.19 K	13.3	9.7	180 J	106	13.4	107
M-15-A	0.80 L	44.7 *	128	0.78 L	58.5 K	19.1	283 J	1210 J *	56.2	230 K
M-15-B	0.36 L	10.3	155	0.50 UL	34.6 K	19.2	54.0 J	52.4 J	24.6	88.5 K
M-15-B MS/MSD	1.0 UL	7.1	104	0.50 UL	9.3 K	8.5	9.9 J	15.7 J	12.4	51.8 K
M-16-C	R	9.9	183	0.68 K	26.0 J	18.5	30.8	492 L *	32.9 J	101 K
N-15-A	1.0 UL	7.5	84.0	0.50 UL	27.8 K	10.2	44.5 J	10.0 J	24.0	55.9 K
O-11-A	0.48 L	61.6 *	126	2.4 K	46.8 J	15.8	197	673 L *	36.2 J	255 K
O-11-B	1.1 L	85.2 *	121	1.2 K	23.3 J	10.6	127	347 L	17.2 J	131 K
O-11-C	0.33 L	10.1	60.7	0.28 K	13.2 J	9.5	45.1	10.7 L	18.2 J	44.5 K
O-14-B	0.64 B	12.5	64.1	0.18 K	12.8	10.4	55.5 J	141	14.1	95.7 J
O-14-C	1.0 UL	14.5	62.0	0.21 K	12.7	9.2	51.2 J	161	13.2	98.2
O-16-A	0.64 B	27.2 *	115	0.95 K	41.8	16.9	60.0 J	1380 *	17.1	400
O-16-B	1.0 UL	28.9 *	76.7	0.80 K	33.4	8.5	80.7 J	408 *	16.0	241 J
O-16-B2	1.0 UL	19.6 *	106	0.75 K	42.7	8.2	112	340	15.8	204
P-14-A	1.0 UL	11.6	50.2	0.50 UL	19.8 K	11.6	106 J	31.3 J	19.6	60.0 K
P-15-A	2.1 L	40.4 *	160	0.50 UL	39.5 K	8.8	66.2 J	1470 J *	16.2	53.6 K
P-15-C	1.0 UL	11.2	58.3	0.50 UL	19.8 K	12.6	256 J	12.7 J	20.4	57.8 K
P-15-C MS/MSD	1.0 UL	8.9	34.5	0.50 UL	8.7 K	7.9	11.0 J	8.9	11.5	42.4
P-16-A	0.54 L	11.5	418	0.53 K	26.1 J	9.0	271	92.7 L	23.8 J	81.2 K
P-16-B	0.40 L	14.7	100	0.40 K	61.0 J	13.8	157	25.2 L	39.7 J	73.1 K
P-16-C	R	9.0	77.0	0.30 K	29.5 J	12.2	221	11.1 L	19.2 J	54.1 K
Q-12-A	1.5 L	109 *	64.6	0.50 UL	26.3 K	7.1	180 J	1250 J *	17.8	42.2 K
R-10-A	0.40 L	16.6	94.2	1.7 K	22.6 J	13.3	73.5	361 L	20.8 J	219 K
R-10-C	1.0 UL	10.2	35.3	0.28 K	8.0 J	8.0	12.6	9.3	10.9 J	40.4
R-11-A	0.59 L	22.4 *	102	0.50 UL	29.5 K	7.8	565 J	294 J	13.1	58.1 K
R-14-A	2.0 L	38.7 *	90.0	0.83 K	29.6 J	12.5	100	799 L *	21.6 J	100 K
R-14-B	0.50 L	10.2	67.5	0.46 K	25.1 J	6.7	104	20.9 L	18.4 J	50.6 K
R-16-A	0.58 B	11.8	86.1	0.52 K	19.8 K	9.5	293 K	387	15.6	148
S-13-A	1.2 L	21.9 *	103	0.89 K	17.1 J	9.9	44.1	426 L *	17.0 J	140 K
S-15-A	2.1 L	66.5 *	83.4	1.3 K	23.9 J	9.5	90.3	522 L *	16.5 J	114 K
T-17-A	0.93 L	21.0 *	136	1.9 K	32.8 J	10.9	71.6	749 L *	22.4 J	337 K
T-17-B	0.52 L	14.7	131	0.73 K	47.7 J	13.7	104	350 L	30.9 J	495 K
T-17-C	R	5.4	198	0.18 K	21.3	8.0	175	10.2 L	14.6	52.9 K
T-17-C2	R	5.4	129	0.17 K	17.1	7.0	204	11.4 L	12.4	42.3 K
T-18-A	0.94 B	19.7 *	108	2.5 K	36.8	8.4	177 J	385	19.4	502

(1) Screening level for Hexavalent Chromium

* = Exceeds Screening Level

U = Not detected.

R = Unusable result.

B = Not detected substantially above the level reported in the laboratory or field blanks.

J = Analyte present. Reported value is estimated.

K = Analyte present. Reported value may be biased high.

L = Analyte present. Reported value may be biased low.

UL = Not detected. Quantitation limit is probably higher.

Table B
 Summary of Laboratory Analytical Data
 PCBs
 8th and Plutus Streets Site

Chemical Name Screening Level Unit Sample ID	AROCLOR 1016	AROCLOR 1221	AROCLOR 1232	AROCLOR 1242	AROCLOR 1248	AROCLOR 1254	AROCLOR 1260	Total PCBs (1)
	NA ug/kg	10000 ug/kg						
E-03-A-PCB	240 U	240 U	240 U	240 U	1200 K	3800 K	2000 K	7000
G-02-B-PCB	45 U	30 J	49	79				
G-05-B-PCB	48 U							
G-11-B-PCB	40 U							
K-02-A-PCB	160 UJ	3100 J	3100					
M-02-A-PCB	38 U	87	87					
M-02-A-PCB-2	38 U	100	100					
M-16-B-PCB	39 U							
O-02-A-PCB	110 U	630 K	920 J	1550				
S-14-B-PCB	43 U							
S-17-B-PCB	44 U	44 U	44 U	790	760	44 U	44 U	1550

(1) Calculated Value. Sum of individual detected Aroclor results.

* = Exceeds Screening Level

U = Not detected.

J = Analyte present. Reported value is estimated.

K = Analyte present. Reported value may be biased high.

UJ = Not detected. Quanitation limit is estimated.